



November 10, 2010

USFWS and MT DNRC
Habitat Conservation Plan
2705 Spurgin Road
Missoula, MT 59804

Dear HCP Project Managers:

These comments are submitted on behalf of the Montana Wood Products Association (MWPA) and its 14 member companies and 35 associate members. All of the companies rely on the health of the timber industry for the livelihood of the more than 7,000 Montanans employed by them.

Something strange happened to the Habitat Conservation Plan (HCP) from its inception to its near conclusion. Support for the HCP was garnered with the understanding that it would provide long-term regulatory certainty and flexibility for DNRC forest management practices regarding HCP species. We bought into that concept because it appeared to be the right track to be on for stable management. Unfortunately, every new version of the HCP brings more stringent regulatory schemes and less certainty that the current DNRC timber management program will flourish under the HCP.

There are several areas of concern that I will outline beginning with the numerous references to climate change that raise a giant red flag considering that it was barely mentioned in the Draft EIS. Apparently Section 4.1, Climate was added to the FEIS because those who use climate change as a catch-all to stop on-the-ground activities expressed their usual opinions while the rest of us were basing our comments on fact.

The HCP FEIS steps completely out of its boundary in attempts to "discuss what is or is not climate change, the direction and magnitude of trends globally, regionally, and locally, and responses to climate change at the global, national, state, and local levels." (FEIS Abstract) The totally inappropriate explanation uses climate change and talks about the "environmental consequences ... of the potential contribution to the production of greenhouse gases from road building and timber harvest...."

As nearly as I can tell, the issue of climate change has been inserted into virtually every part of the document because of "suggestions from the USFWS regarding how to address climate

change in federal National Environmental Policy Act (NEPA) documents.” For example, there is no proven scientific basis used in the FEIS for the assumption that timber harvest and its associated roads contribute to an increase in atmospheric greenhouse gas levels and yet in Chapter 4, Effects of Forest Management on CO₂ and Other GHG Emissions, the lead statement is “Increases in atmospheric GHG levels, primarily CO₂ **could** (added emphasis) be caused by a variety of factors related to forest management activities”.

This is exactly why Montana should not follow the federal government in land management decisions. Statements like that are totally subjective and speculative with no place in a supposedly science-based document. Unfortunately, now many statements like the one above appear in the FEIS and destroy the credibility of the effort.

Following are examples of why the climate change statements have moved the FEIS from science to speculation. In the late 1980s and early 1990s, two areas relating to timber management were agreed upon by interested parties and continue to this day to be successful. Voluntary Best Management Practices (BMPs) along with the Streamside Management Zone Act (SMZs) were instituted to ensure proper harvest techniques were used and water quality was protected. Biennial audits have proven both programs to be smashing successes with compliance in the 98 percent range.

Therefore, we are puzzled by the increase of no-harvest zones from the required 25 feet to 50 feet with no apparent scientific basis. In the FEIS Abstract, the statement is made “While the science is not yet clear how a no-harvest buffer would make a difference in terms of climate change, doubling the width of the no-harvest buffer is also a proactive approach to help insulate streams in harvest units against potential effects of climate change.”

This is quite a remarkable inclusion in a document that in the initial versions made virtually no mention of climate change much less the need to double the width of buffers as a “proactive approach” and now “potential effects of climate change” becomes a reason. The doubling width is obviously arbitrary and suggests BMPs and SMZs are not working which is completely untrue. The use of the system of 25 feet that has proven viable for two decades should not be tossed aside without reason and there is no reason in the FEIS language.

Another statement this time related to roads and not unlike the no-harvest buffer poor explanation sounds like contrived rationale to stop on-the-ground activities. “The equipment used to construct, reconstruct, and maintain roads also contribute CO₂ emissions to the atmosphere. These activities, as well as road use, can generate dust, which can then contribute to local atmospheric aerosol levels.” With that line of thinking some dust could occur so roads should not be used. This is another subjective statement that needs to be removed.

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Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Ellen Simpson". The signature is written in dark ink and is positioned above the printed name and title.

Ellen Simpson
Executive Vice President

cc: MWPA Board of Directors